

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 5:22-cr-13
)	
AYUB MOHAMED,)	
Defendant.)	

GOVERNMENT’S RESPONSE TO MOTION FOR RELEASE ON CONDITIONS

The United States of America, by and through its attorney, Nikolas P. Kerest, United States Attorney for the District of Vermont, hereby files this response to defendant Ayub Mohamed’s Motion for Release on Conditions.

Following his arrest in February 2022, Mohamed repeatedly failed to comply with conditions of pretrial release. He used marijuana, submitted diluted urine samples, and failed to report contact with law enforcement. His behavior on pretrial release demonstrated his failure to understand the seriousness of the charges against him and to respect the conditions of his release.

Since August 2022, however, Mohamed has been in custody. According to the Probation office, he has struggled with behavioral expectations even in custody. The disciplinary incident report the government has reviewed, however, appears to relate to Mohamed’s poor compliance on a single day on which Mohamed may have been ill. Given Mohamed’s youth and his lack of previous exposure to the formality of federal supervision, the government does not oppose his release on conditions that require Mohamed to engage in drug treatment and/or mental health counseling, to maintain a steady residence, and to complete his education. Subject to Probation’s insights on the program, the Spectrum program suggested by defense counsel appears to be an appropriate placement for Mohamed.

For these reasons, the government does not object to the motion for release from custody if appropriate conditions can be set.

Dated at Burlington, in the District of Vermont, September 23, 2022.

Respectfully submitted,

UNITED STATES OF AMERICA

NIKOLAS P. KEREST

United States Attorney

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